

IN RE  
RICARDO SANCHEZ TORRES  
HODALYS MILAGROS GUZMAN LOPEZ  
Debtor(s)

CASE NUMBER: 17-03605-MCF  
CHAPTER 13

**TRUSTEE'S OBJECTION TO CLAIM NUMBER 03  
FILED BY SCOTIABANK  
NOTICE AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

COMES NOW, Alejandro Oliveras-Rivera, Standing Chapter 13 Trustee, and very respectfully ALLEGES, STATES and PRAYS:

1. On 6/12/2017 claim number 03 was filed by SCOTIABANK in the amount of \$776.35. The Trustee objects to this claim under the following grounds:
  - The aforementioned proof of claim fails to provide an itemized statement of the interest, fees, expenses or charges incurred before the petition was filed as required by FBRP 3001(c)(1).
2. Debtor is not a member of the U.S. Armed Forces, the Coast Guard, the Public Health Service or the National Oceanic and Atmospheric Administration, as evidence by the Certificate issued by the U.S. Department of Defense, copy of which is attached only to the original of this motion and movant's copy.

WHEREFORE, it is respectfully requested from this Honorable Court to: DISALLOW THE AFOREMENTIONED CLAIM.

**30 DAY NOTICE TO ALL CREDITORS AND PARTIES IN INTEREST :** You are hereby notified that you have thirty (30) days from the date of this notice to file an opposition to the foregoing motion and to request a hearing. If no opposition is filed within the prescribed period of time, the trustee's motion will be deemed unopposed and may be granted without further hearing unless (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If a timely opposition is filed, the court will schedule a hearing as a contested matter.

**CERTIFICATE OF SERVICE:** I hereby certify that on this date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends notification of such filing to all those who in this case have registered for receipt of notice by electronic mail. I further certify that the foregoing has been served to U.S. Trustee at ustpregion21.hr.ecf@usdoj.gov and by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non ECF/CM participants: debtor(s), SCOTIABANK DE PR VAZQUEZ AND ESTRELLA LAW OFFICES LLC PMB 407 AVE ESMERALDA 405 SUITE 2 GUAYNABO PR 00969 and parties in interest that have filed notices of appearance, included in the service list attached to the original hereof.

**RESPECTFULLY SUBMITTED** at San Juan, Puerto Rico, this 6/13/2017.

**S/ALEJANDRO OLIVERAS RIVERA**  
ALEJANDRO OLIVERAS RIVERA  
Chapter 13 Trustee  
PO Box 9024062, San Juan, PR 00902-4062  
Phone 787-977-3500 Fax 787-977-3521  
CCC - RS

The undersigned hereby certifies that a true copy of the foregoing document was mailed by first class mail or electronically sent to the parties listed below:

SCOTIABANK  
PO BOX 362230  
SAN JUAN, PR 00936 -2230

SCOTIABANK DE PR  
VAZQUEZ AND ESTRELLA LAW OFFICES LLC  
PMB 407 AVE ESMERALDA 405 SUITE 2  
GUAYNABO, PR 00969

RICARDO SANCHEZ TORRES and HODALYS MILAGROS GUZMAN LOPEZ  
PO BOX 372274  
CAYEY, PR 00737-2274

MIRIAM A MURPHY LIGHTBOURN\*

Miriam A Murphy and Associates PSC  
PO BOX 372519  
CAYEY, PR 00737

DATED: 6/13/2017

Page 1 of 1

- CASE NO. 17-03605-MCF

/s/ Hector Perez  
OFFICE OF THE CHAPTER 13 TRUSTEE